

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	)	
Timothy D. Tatsak Jr. and	)	Case No.: 14-24264CMB
April L. Tatsak	)	Chapter 13
Debtor(s)	)	
_____	)	Related to Doc. #225
Lawrence Willis, Esquire	)	
Willis & Associates	)	
Applicant,	)	
	)	
Vs.	)	
Ronda J. Winnecour, Esquire,	)	
Chapter 13 Trustee	)	
Respondent(s)	)	

TRUSTEE'S OBJECTION TO APPLICATION FOR COMPENSATION

1. This case was filed on October 23, 2014.
2. Ronda J. Winnecour is the Chapter 13 Standing Trustee in this case.
3. Lawrence Willis is Applicant and counsel of record for debtors.
4. Applicant filed a second fee application seeking additional fees of \$1000.00.
5. The Trustee objects to the Application.
6. First, the Application premises the calculation of the fee on a retainer of \$1500.00. The retainer was actually \$750.00. In addition to the retainer of \$750, counsel has been paid an additional \$5250.00 through the plan for a total of \$6,000.00.
7. As to charges for the meeting of creditors on December 22, 2014, the charges are not prorated across each of the five cases counsel had meetings for that day. Travel time is also not prorated nor discounted. In particular, counsel had another case at 10:00 that morning, in addition to a case at 9:00, another at 11:00 and another at 1:00 p.m.
8. As to charges for the meeting of creditors on January 26, 2015, the charges are not prorated across each of the four cases counsel had meetings for that day.

Travel time is also not prorated nor discounted. In particular, counsel had another case at 11:00 that morning, and another at 10:00 and another at 1:00 p.m.

9. On May 6, 2015, the travel time is neither prorated with another hearing counsel attended that morning, nor discounted.
10. On May 20, 2015, travel time is not discounted.
11. On June 11, 2015, counsel charges a full hour for attending a conciliation conference even though he should prorate his time across all ten cases heard that day. Likewise, the travel time is not prorated nor discounted.
12. On October 15, 2015, counsel charges a full hour for attending a conciliation conference even though he should prorate his time across all 15 cases heard that day. Likewise, the travel time is not prorated nor discounted.
13. On January 7, 2016, 2015, counsel charges a full hour for attending a conciliation conference even though he should prorate his time across all eight cases heard that day. Likewise, the travel time is not prorated nor discounted.
14. On February 17, 2016 counsel charges a full hour for attending a status conference even though he should prorate his time across all three cases heard that day during the same hour. Likewise, the travel time is not prorated nor discounted.
15. In sum, the Application is so riddled with error and inflation of charges that it should be denied.

WHEREFORE, the Trustee requests that the Application be denied.

Respectfully Submitted,

January 23, 2020

/s/ Jana S. Pail  
Jana S. Pail – PA I.D. #88910  
Attorney for the Trustee  
Suite 3250-U.S. Steel Building  
600 Grant Street  
Pittsburgh PA 15219  
412-471-5566  
[jpail@chapter13trusteewdpa.com](mailto:jpail@chapter13trusteewdpa.com)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	)	
Timothy D. Tatsak Jr. and	)	Case No.: 14-24264CMB
April L. Tatsak	)	Chapter 13
Debtor(s)	)	
	)	Related to Doc. #225
Lawrence Willis, Esquire	)	
Willis & Associates	)	
Applicant,	)	
	)	
Vs.	)	
Ronda J. Winnecour, Esquire,	)	
Chapter 13 Trustee	)	
Respondent(s)	)	

CERTIFICATE OF SERVICE

I hereby certify that on the date shown below, I served a true and correct copy of the foregoing document upon the following, by regular United States First Class Mail, postage prepaid, unless otherwise noted:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
Office of the U.S. Trustee  
Liberty Center, Suite 970  
1001 Liberty Avenue  
Pittsburgh, PA 15222

Timothy D. and April L. Tatsak  
144 Church Road  
Rural Valley, PA 16249

Lawrence W. Willis, Esquire  
Willis & Associates  
201 Penn Center Blvd.  
Suite 310  
Pittsburgh, PA 15235

M&T Bank  
PO Box 62182  
Baltimore, MD 21264

Ally Financial  
Serviced by Ally Servicing LLC  
PO Box 130424  
Roseville, MN 55113-0004

Brett Solomon, Esquire  
Tucker Arensberg PC  
1 PPG Place #1500  
Pittsburgh, PA 15222

Andrew F. Gornall, Esquire  
KML Law Group, P.C.  
701 Market Street  
Suite 5000  
Philadelphia, PA 19106-1532

Armstrong Associates FCU  
414 Ford Street  
Ford City, PA 16226

1-23-2020

/s/ Rosa M. Richard  
Administrative Assistant  
Office of the Chapter 13 Trustee  
US Steel Tower – Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
412) 471-5566  
cmecf@chapter13trusteewdpa.com